

DOCKET SECTION  
BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

UNITED STATES POSTAL SERVICE  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO  
UNITED PARCEL SERVICE WITNESS SELICK  
(USPS/UPS-T2-18-25)


Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to United Parcel Service witness Sellick: USPS/UPS-T2-18-25.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Susan M. Duchek

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2990; Fax -5402  
January 28, 1998

USPS/UPS-T2-18. Please refer to UPS-Sellick-WP-1-I-C2. Please confirm that the title should read:

UPS-SELLICK-WP-1-I-C2  
Development of Test Year Costs - UPS Case  
File Rll100.xls

If you do not confirm, please explain fully.

USPS/UPS-T2-19. Please refer to UPS-Sellick-WP-1-I-C1 and UPS-Sellick-WP-1-I-D1. In the first workpaper, please refer to RLL100.XLS, Summary of Affected Components, pages 1-5, and in the second workpaper, please refer to ROLL\_0.XLS, Summary of Affected Components, pages 1-5. Please confirm that the title on these pages was edited in one of the versions to either include or exclude the qualifier "TYAR". If you do not confirm, please explain fully.

USPS/UPS-T2-20. Please refer to UPS-Sellick-WP-1-I-C2 and UPS-Sellick-WP-1-I-D2. In the first workpaper, please refer to RLL100.XLS, CS 3 Sheet, page 6 of 6, and in the second workpaper, please refer to Roll\_.XLS, CS 3 Sheet, page 6 of 6.

- a. Please confirm that the function of this page is to adjust test year after rates, after workyear mix adjustment costs. If you do not confirm, please explain fully.
- b. Please confirm that the "Factor" row above "First Class Mail:" is different in the two files. If you do not confirm, please explain fully.
- c. Please provide all calculations and sources used in the calculation of each of the factors appearing in the "Factor" row.

- d. Please explain fully the purpose of the factors in the ROLL\_0.XLS spreadsheet and how they are applied in this spreadsheet. Are these factors used elsewhere in any of the workpapers? If the response is affirmative, please provide a complete list of citations.
- e. Please explain fully the purpose of the factors in the RLL100.XLS spreadsheet and how they are applied in this spreadsheet. Are these factors used elsewhere in any of the workpapers? If the response is affirmative, please provide a complete list of citations.
- f. Please confirm that the title appearing on the RLL100.XLS sheet, "Adjusted PHB TY AR After WY Mix", is also the appropriate title for the comparable sheet on ROLL\_0.XLS. If you do not confirm, please explain fully.

USPS/UPS-T2-21. Please refer to UPS-Sellick-WP-1-I-C2 and UPS-Sellick-WP-1-I-D2. In the first workpaper, please refer to RLL100.XLS, CS 11 Sheet and in the second workpaper, please refer to ROLL\_0.XLS, CS 11 Sheet.

- a. Please confirm that the sources listed for columns [9] - [12] on page 2 of 3 of each workpaper should read:

[9]	= [5] / [1]
[10]	= [6] / [2]
[11]	= [7] / [3]
[12]	= [8] / [4].

If you do not confirm, please explain fully.

- b. Please confirm that the sources listed for columns [17] - [20] on page 3 of 3 of each workpaper should read:

[17]	= [11] / [15]
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$$\begin{aligned}[18] &= [12] / [16] \\ [19] &= [13] / [17] \\ [20] &= [14] / [18].\end{aligned}$$

If you do not confirm, please explain fully.

- c. Please provide all calculations and sources used in the calculation of each of the factors appearing in the "Factor" row of page 3 of 3 in the ROLL\_0.XLS spreadsheet.
- d. Please explain fully the purpose of the factors in the ROLL\_0.XLS spreadsheet and how they are applied in this spreadsheet. Are these factors used elsewhere in any of the workpapers? If the response is affirmative, please provide a complete list of citations.
- e. Please explain fully the purpose of the factors in the RLL100.XLS spreadsheet and how they are applied in this spreadsheet. Are these factors used elsewhere in any of the workpapers? If the response is affirmative, please provide a complete list of citations.

USPS/UPS-T2-22. Please refer to UPS-Sellick-WP-1-I-C2 and UPS-Sellick-WP-1-I-D2. In the first workpaper, please refer to RLL100.XLS, CS 15 Sheet and in the second workpaper, please refer to ROLL\_0.XLS, CS 15 Sheet.

- a. Please confirm that the sources listed for columns [4] - [5] on page 1 of 2 of each workpaper should read:

$$\begin{aligned}[4] &= [3] / [1] \\ [5] &= [4] / [2].\end{aligned}$$

If you do not confirm, please explain fully.

- b. Please confirm that the sources listed for columns [9] - [10] on page 2 of 2 of each workpaper should read:

$$\begin{array}{ll} [9] & =[5] \times [7] \\ [10] & =[6] \times [8]. \end{array}$$

If you do not confirm, please explain fully.

- c. Please provide all calculations and sources used in the calculation of each of the factors appearing in the "Factor" row.
- d. Please explain fully the purpose of the factors in the ROLL\_0.XLS spreadsheet and how they are applied in this spreadsheet. Are these factors used elsewhere in any of the workpapers? If the response is affirmative, please provide a complete list of citations.
- e. Please explain fully the purpose of the factors in the RLL100.XLS spreadsheet and how they are applied in this spreadsheet. Are these factors used elsewhere in any of the workpapers? If the response is affirmative, please provide a complete list of citations.

USPS/UPS-T2-23. Please refer to UPS-Sellick-WP-1-I-C2 and UPS-Sellick-WP-1-I-D2. In the first workpaper, please refer to RLL100.XLS, CS 18 Sheet, page 6 of 6, and in the second workpaper, please refer to ROLL\_0.XLS, CS 18 Sheet, page 6 of 6.

- a. Please provide all calculations and sources used in the calculation of each of the factors appearing in the "Factor" row.
- b. Please explain fully the purpose of the factors in the ROLL\_0.XLS spreadsheet and how they are applied in this spreadsheet. Are these factors used

elsewhere in any of the workpapers? If the response is affirmative, please provide a complete list of citations.

- c. Please explain fully the purpose of the factors in the RLL100.XLS spreadsheet and how they are applied in this spreadsheet. Are these factors used elsewhere in any of the workpapers? If the response is affirmative, please provide a complete list of citations.

USPS/UPS-T2-24. Please refer to UPS-Sellick-WP-1-I-C2 and UPS-Sellick-WP-1-I-D2. In the first workpaper, please refer to RLL100.XLS, CS 20 Sheet and in the second workpaper, please refer to ROLL\_0.XLS, CS 20 Sheet.

- a. Please confirm that the sources listed for columns [7] - [9] on page 1 of each workpaper should read:

$$\begin{array}{ll} [7] & =[4] / [1] \\ [8] & =[5] / [2] \\ [9] & =[6] / [3]. \end{array}$$

If you do not confirm, please explain fully.

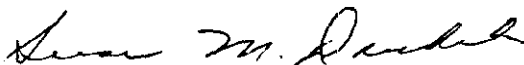
- b. Please provide all calculations and sources used in the calculation of each of the factors appearing in the "Factor" row of page 3 of 3 in the ROLL\_0.XLS spreadsheet. Please explain fully the purpose of the factors in the ROLL\_0.XLS spreadsheet and how they are applied in this spreadsheet. Are these factors used elsewhere in any of the workpapers? If the response is affirmative, please provide a complete list of citations.

- c. Please provide all calculations and sources used in the calculation of each of the factors appearing in the "Factor" row of page 2 of 2 in the RLL100.XLS spreadsheet. Please explain fully the purpose of the factors in the RLL100.XLS spreadsheet and how they are applied in this spreadsheet. Are these factors used elsewhere in any of the workpapers? If the response is affirmative, please provide a complete list of citations.
- d. Please confirm that the titles referring to "TY BR" on page 2 of each spreadsheet should refer to "TY AR". If you do not confirm, please explain fully.

USPS/UPS-T2-25. Please refer to Table 6 on page 21 of your testimony. Please confirm that you have included both BMC and ASF costs in your calculation of "All Offices Operation Codes 01 and 07." If you do not confirm, please explain fully how these were excluded.

### CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
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Susan M. Duchek

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Washington, D.C. 20260-1137  
January 28, 1998